

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America )

v. )

Ramon Emilio Ramirez Frias )

Case No. 25-MJ-382 )

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 11, 2025 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. 1326(b)

Reentry of removed aliens

This criminal complaint is based on these facts:

See affidavit of Probable Cause.

☒ Continued on the attached sheet.

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/s/ Gregory O'Neill*Complainant's signature*

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Gregory O'Neill - Supervisory Deportation Officer*Printed name and title*

Sworn to me telephonically in accordance with Fed. R. Crim. P. 4.1.

Date: 02/25/2025

Digitally signed by

Elizabeth Hey

Date: 2025.02.25

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*Judge's signature*City and state: Philadelphia, Pennsylvania

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Hon. Elizabeth T. Hey*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**AFFIDAVIT**

1. I, Greg ONeill, am a Supervisory Detention and Deportation Officer (“SDDO”) at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I have served as an SDDO with ICE since December 29, 2024. My previous position was a Deportation Officer (“DO”) assigned to the Federal Bureau of Investigation (“FBI”) as a task force officer (“TFO”) since 2014. I have served as an “Immigration Officer” since November 2001. I conduct investigations related to violations of the Immigration and Nationality Act, including investigations of foreign-born nationals, who have been deported from the United States and subsequently re-enter the United States illegally. I am currently assigned to the ICE Office of Enforcement and Removal Operations in Philadelphia, Pennsylvania. As part of my duties, I investigate violations of “Title 8 of the United States Code (“U.S.C.”), including violations of immigration offenses.

2. I have prepared this affidavit in support of a criminal complaint against Ramon Emilio RAMIREZ-FRIAS, a.k.a.: Willy RAMIREZ-FRIAS (hereinafter referred to as “RAMIREZ-FRIAS”) where there is probable cause to believe that RAMIREZ-FRIAS, an alien, that is an individual who is not a citizen or national of the United States, re-entered the United States after removal, in violation of 8 U.S.C. § 1326(b)(2).

3. This affidavit is based on information I obtained from my personal observations, my training and experience, review of documentary evidence, and information provided to me by other members of the investigation. Because this affidavit is submitted only for the limited

purpose of establishing probable cause for a criminal complaint and arrest warrant, it does not include all information known to the government because of the investigation.

4. On or about October 22, 2024, information was received from a confidential source (“CS”) that has continually and consistently provided reliable information to me for approximately five (5) years. This CS has cooperated with the FBI for several years and has provided information that has led to numerous arrests and convictions. The CS’s initial cooperation was motivated by his desire to minimize his own sentencing exposure in a criminal case, but since sentencing in that case, the CS has provided unsolicited information such as what he has provided in the instant matter. The CS stated that “Willy Ramirez a.k.a., “Mollo” had returned to the United States after being deported. The CS stated that the CS knew him, observed him in Philadelphia, Pennsylvania and knew that he was living in Philadelphia, Pennsylvania with his ex-wife. I was familiar with “Willy Ramirez” and verified his identity via a photograph of RAMIREZ-FRIAS that was sent to the CS.

5. On or about January 27, 2025, information was received from another confidential source (“CS #2”) that has continually and consistently provided reliable information to me for approximately two (2) years. CS#2 is the recipient of Deferred Action (deliberate action not to enforce an immigration violation) submitted by the Federal Bureau of Investigation (“FBI”) and granted by ICE and has provided information that has led to numerous arrests and convictions. CS #2 stated that an individual that he knew as “Moyo” had returned to the United States. CS#2 reported that “Moyo” was residing on St. Vincent Street in Philadelphia, Pennsylvania. CS#2 did not know the exact address but said that “Moyo” was living there with his brother. This information could not be verified. Surveillance was conducted for several days with no results.

6. On or about February 7, 2025, information was received from a third confidential source (“CS#3”) that has continually and consistently provided reliable information to me for approximately ten (10) years. CS#3 is a registered FBI Confidential Human Source, for which I am a TFO, that has provided information that has led to numerous arrests and convictions. CS#3 stated that CS#3 knew that an individual named “Moyo” was back but was not exactly sure of his address. CS#3 knew RAMIREZ-FRIAS was living in the “Northeast,” referring to Northeast Philadelphia in Pennsylvania.

7. I conducted record checks in DHS databases to verify that, following RAMIREZ-FRIAS’s removal from the United States, there was no evidence that he made a lawful entry, application to enter, or was any authorization granted by the Attorney General or their successor, the Secretary of the Department of Homeland Security.

8. I know that DHS maintains a file on all aliens encountered by ICE. This file, known as the Alien File (“A-File”), contains documentation relating to the alien, including his/her photograph, warrants of deportation, fingerprints, documents reflecting criminal history, documents reflecting the country of citizenship, and other documents related to the lawful or unlawful status the non-citizen has in the United States. Each non-citizen is assigned an identification number, referred to as the alien registration number.

9. I conducted further record checks in the National Crime Information Center (“NCIC”) for RAMIREZ-FRIAS’s criminal history, as well as his immigration history. Under the alien number (240 445 999) and FBI number provided (120050CD2), it was found that RAMIREZ-FRIAS had previous encounters with ICE. I conducted further checks in databases for RAMIREZ-FRIAS’ immigration history in the United States. It was found that RAMIREZ-FRIAS had been removed from the United States to the Dominican Republic via ICE Air

Operations on November 7, 2023. RAMIREZ-FRIAS' Alien File was requested for a complete review.

10. The A-File numbered A240 445 999 was received and is maintained in the name of Willy RAMIREZ-Frias with an alias of Ramon Emilio RAMIREZ-FRIAS, matching the government's electronic indices. The electronic records contain this individual's biographical information, family history, records of encounters, conviction records, photographs, and fingerprints. Based on the review of electronic records and the A-File, I have concluded that it does in fact pertain to the individual in this matter. The A-File and electronic records reflects the following information relative to this individual:

- a. RAMIREZ-FRIAS is a citizen and national of the Dominican Republic.
- b. On or about April 6, 2004, in Aguadilla, Puerto Rico, RAMIREZ-FRIAS was arrested by the United States Border Patrol and processed for Voluntary Return to the Dominican Republic.
- c. On an unknown date RAMIREZ-FRIAS entered the United States without inspection, admission, or parole by an immigration officer.
- d. On April 21, 2022, in Philadelphia, Pennsylvania, RAMIREZ-FRIAS was arrested by the FBI for distribution of heroin. In the United States District Court for the Eastern District of Pennsylvania, the defendant entered a plea of guilty to Conspiracy to Distribute a Mixture and a Substance Containing a Detectable Amount of Heroin, in violation of 21 U.S.C. § 846. On May 31, 2023, RAMIREZ-FRIAS was sentenced to 21 months imprisonment and two years of supervised release.

e. On or about October 12, 2023, RAMIREZ-FRIAS was issued a Notice To Appear in immigration proceedings pursuant to Sections 212(a)(6)(A)(i), 212(a)(2)(A)(i)(I), 212(a)(2)(A)(i)(II), and 212(a)(2)(C) of the Immigration and Nationality Act, as an alien who is inadmissible to the United States as an alien who entered without inspection, an alien who has been convicted of a crime involving moral turpitude, an alien who has been convicted of a controlled substance violation and an alien who the United States has reason to believe is a controlled substance trafficker.

f. On October 24, 2023, RAMIREZ-FRIAS was ordered removed by an immigration judge at Elizabeth, New Jersey from the United States to the Dominican Republic.

g. On November 7, 2023, RAMIREZ-FRIAS was removed from the United States to the Dominican Republic. On this same day, immigration officials executed a Form I-205, Warrant of Deportation/Removal containing RAMIREZ-FRIAS' signature, photograph, fingerprint, and the signature of the immigration officials who witnessed his departure.

h. RAMIREZ-FRIAS illegally re-entered the United States at an unknown place on an unknown date. A search of DHS databases revealed that RAMIREZ-FRIAS did not seek permission of the Attorney General of the United States, or his successor, the Secretary of Homeland Security, for permission to reapply for admission.

11. On February 11, 2025, RAMIREZ-FRIAS was encountered and arrested by ICE and members of the FBI Violent Gangs Taskforce in Philadelphia. RAMIREZ-FRIAS was observed departing a restaurant. ICE placed RAMIREZ-FRIAS in administrative custody. RAMIREZ-FRIAS's electronic fingerprints were taken and matched the same individual that was previously removed from the United States to Dominican Republic on November 7, 2023.

12. Based on the foregoing, your affiant believes that there is probable cause to conclude that Willy RAMIREZ-FRIAS, illegally re-entered the United States after removal, in violation of Title 8, United States Code, § 1326(b)(2).

/s/ Gregory O'Neill

Gregory O'Neill

Supervisory Detention and Deportation Officer  
Immigration and Customs Enforcement

SUBSCRIBED TO AND SWORN TO ME BY TELEPHONE IN ACCORDANCE WITH FED  
R. CRIM. P. 4.1 THIS 25<sup>th</sup> DAY OF February 2025.



Digitally signed by  
Elizabeth Hey  
Date: 2025.02.25 13:18:39  
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The Honorable Elizabeth T. Hey  
United States Magistrate Judge  
Eastern District of Pennsylvania